

ILLINOIS COMMERCE COMMISSION

DOCKET No. 22-0431

SURREBUTTAL TESTIMONY

OF

WILLIAM H. REANY, II

Submitted On Behalf

Of

**AMEREN ILLINOIS COMPANY
d/b/a Ameren Illinois**

November 18, 2022

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8 **I. INTRODUCTION**

9 **A. Witness Identification**

10 **Q. Please state your name and business address.**

11 A. My name is William H. Reany, II. My business address is 10 Executive Drive,
12 Collinsville, Illinois 62234.

13 **Q. Are you the same William H. Reany, II who sponsored Direct Testimony and**
14 **Rebuttal Testimony in this proceeding?**

15 A. Yes.

16 **B. Purpose, Scope and Identification of Exhibits**

17 **Q. What is the purpose of your surrebuttal testimony in this proceeding?**

18 A. The purpose of my surrebuttal testimony is to respond to Staff and Intervenors rebuttal
19 testimony filed on November 7, 2022 and to introduce Ameren Illinois Company's (Ameren
20 Illinois or the Company) surrebuttal Beneficial Electrification Plan (BE Plan) and the
21 comprehensive suite of programs that comprise its surrebuttal BE Plan. My surrebuttal testimony
22 discusses the proposed modifications to programs reflected in surrebuttal BE Plan, Equity

23 Investment Eligible and Low-Income Communities, Charging Standards, and the size and scope
24 of programs.

25 **Q. Are you sponsoring any exhibits with your testimony?**

26 A. Yes, I am sponsoring two (2) exhibits.

27 Ameren Exhibit 10.1 - Surrebuttal Beneficial Electrification Plan.

28 Ameren Exhibit 10.2 – Surrebuttal Program Cost Details.

29 **Q. Are you offering any legal opinions in your testimony?**

30 A. No. I am not an attorney and do not offer any legal opinions.

31 **Q. Do any of the Staff or Intervenor witnesses recommend that the Illinois Commerce**
32 **Commission reject Ameren's Rebuttal BE Plan?**

33 A. No. However certain witnesses recommend changes to aspects of Ameren's Rebuttal BE
34 Plan.

35 **Q. Please summarize the conclusions of your surrebuttal testimony.**

36 A. In my surrebuttal testimony, I recommend that the Commission approve Ameren Illinois'
37 petition in this proceeding, and that the Commission should approve Ameren Illinois' surrebuttal
38 BE Plan, without modification. Ameren Illinois' proposed surrebuttal BE Plan addresses each of
39 the ten components that the Electric Vehicle Act (EV Act) requires the Company's BE Plan to
40 contain and the 8 items the Commission must consider for plan approval, and the investments
41 and expenditures contained within the Company's BE Plan are designed to achieve the objectives
42 outlined in the EV Act. If approved as proposed, Ameren Illinois' BE Plan provides benefits to
43 customers, and enables Ameren Illinois the opportunity to provide significant progress toward
44 meeting the State's ambitious clean energy objectives, including the support of 1,000,000 electric

vehicles by 2030. In addition, there remain multiple and varied positions presented in Staff and Intervenor rebuttal testimony. It is impossible to balance and satisfy every party's interest, since some parties' interests necessarily are in direct conflict with each other. While I may not specifically focus on each and every party's recommendation in my surrebuttal testimony, that silence does not mean acceptance and I reserve the right to address in the future. To that end, Ameren Illinois' continues to incorporate parties' feedback where practicable, while at the same time ensuring that the surrebuttal BE Plan is compliant and meets the statutory objectives outlined in the EV Act.

II. PROPOSED MODIFICATIONS TO PROGRAMS REFLECTED IN SURREBUTTAL BE PLAN

Q. You stated that the Company incorporated additional suggested modifications to its BE Plan based on Staff and Intervenor rebuttal testimony. Can you elaborate on what programs or aspects of the BE Plan the Company modified in its surrebuttal BE Plan?

A. The following programs or aspects of the rebuttal BE Plan have been modified in the surrebuttal BE Plan, and the programmatic changes that I discuss here are also reflected in Ameren Ex. 10.1 and Ameren Ex. 10.2.

1. Fleet Facility Program: The Fleet Facility Program budget was reduced to be no more than 6.34% of the BE Plan budget for 2024 and 2025.
2. EVCP Residential Program: Shifted funds from the Fleet Facility Program to support additional participation in programs that have a RIM above 1.0.
3. EVCP Multifamily Program: Shifted funds from the Fleet Facility Program to support additional participation in programs that have a RIM above 1.0.

- 67 4. Trade Ally: Slight budget increase to accommodate the increased participation
68 support for the EVCP Residential Program.
- 69 5. Ameren Illinois Service Territory Light Duty EV Adoption Support Level was
70 updated to include the program participation shift from the Fleet Facility Program to
71 the Residential and Multifamily Programs.

72 **Q. Can you explain the process the Company used when it evaluated whether to**
73 **incorporate Staff and Intervenor suggested modifications into the surrebuttal BE Plan?**

74 A. As I explained in part above, there are elements of Staff and Intervenor proposed
75 program modifications that the Company did not incorporate for a variety of reasons, and it
76 should be noted that some suggested program revisions are in conflict with each other, which
77 again highlights the challenge and unreasonableness of trying to accommodate each parties'
78 interest. Nevertheless, and generally, the Company did not incorporate proposals: whose
79 implementation was not practicable; premature; not fully developed or undefined; inconsistent
80 with the EV Act; or not accompanied by a cost-benefit analysis. In sections below, I highlight
81 some, but not all, suggested programmatic revisions suggested by Staff and Intervenors, and
82 provide an explanation for why those suggested revisions were not incorporated in the Company
83 proposed surrebuttal BE Plan.

84 **III. EQUITY INVESTMENT ELIGIBLE AND LOW-INCOME COMMUNITIES**

85 **Q. AG witnesses Borden and Lane continue to question the appropriateness of rebates**
86 **for level 2 (L2) chargers for equity investment eligible and/or low-income residential**
87 **customers. How do you respond?**

88 A. As stated in my rebuttal testimony, the cost of L2 charging equipment and installation
89 may be a barrier to some Equity Investment Eligible (EIE) and/or Low-Income (LI) residential

customers who would like to purchase an EV and charge at home with L2 charging. The rebates for L2 charging do reduce the cost of EV ownership and the BE Plan budget flexibility will allow for the shifting of funds between programs, if needed, similar to the AG's recommendation.

Q. What is the basis for the AG witnesses continued objection to providing rebates to cover the installation of L2 charging equipment for equity investment eligible and/or low-income residential customers?

A. AG witnesses Borden and Lane, while conceding that they do not presume to know exactly what the needs of local communities are, state if the main barrier to adoption is high upfront cost of an EV, it is unclear how rebates for Level 2 chargers would address this problem or enable customers to benefit from electrification. (AG Ex. 2.0 at 3 and 4)

Q. Do you agree with the concerns expressed by the Attorney General?

A. No, while the Company certainly appreciates the concerns expressed by the witnesses for the Attorney General, these rebates do reduce the overall cost of EV ownership and support 40% of make-ready infrastructure incentives to facilitate the rapid deployment of charging equipment in equity investment eligible and low-income communities. According to the California SB 1000 Report cited by the AG, "most charging occurs at home and lack of home charging is a major barrier to PEV adoption."

Q. AG witnesses Borden and Lane also express concerns that no studies that they have reviewed demonstrate that Public Charging Facility and Corridor Charging Facility initiatives promote low-income EV adoption, do you agree?

A. No, I do not. In the EV Act, the legislature made it clear that the Company's BE Plan is expected to support a 40% investment in make-ready infrastructure incentives for the rapid deployment of charging equipment in low-income and equity investment eligible communities.¹ The Company has identified a direct barrier to adoption of EVs in low-income and equity investment eligible communities – the cost of charging equipment – and has designed its rebates for Level 2 chargers to address that barrier of adoption.

IV. CHARGING STANDARDS

A. Response to Intervenors

Q. Did any Intervenor witnesses propose modifications or express concern with charging standards related to the BE Plan?

A. Yes, Staff witness Kierbach, ChargePoint witness Deal and EDF witness MacDougall each address certain aspects regarding the issue of charging standards.

Q. Please summarize Mr. Kierbach's concerns or recommendations related to charging standards in the Company's BE Plan.

A. Staff witness Kierbach has concerns regarding the Company's lack of charging standards, the lack of information on uptime requirements as part of the annual report, and the use of smart chargers. Witness Kierbach also makes two recommendations that Ameren: (1) Modify Ameren Exhibit 7.3 to reflect the minimum requirements of 100kW in the Corridor Charging Facility Charging Program because it specifies exactly the minimum kW to charge two vehicles for level 3 charging and (2) Modify its Public Charging Facility Program to clarify the capability to charge at least two vehicles simultaneously per charging level.

¹ 20 ILCS 627/45(d)(2).

132 **Q. How do you respond to Staff witness Kierbach's lingering concerns about the lack of**
133 **charging standards?**

134 A. Staff witness Kierbach states Ameren should reduce or exclude incentives for
135 CHAdeMO, even if it creates a potential barrier to EV adoption for EIE and/or LI customers, and
136 new charging stations receiving incentives should at a minimum require a CCS connector. Rider
137 EVCP already requires public charging stations receiving a supplemental line extension
138 incentive to install, at a minimum, at least one CCS connector.

139 **Q. Please respond to Staff witness Kierbach's continuing concerns about Ameren's**
140 **refusal to adopt proposed NEVI uptime requirements, and set some level of responsibility,**
141 **as a condition for public charging stations to receive the supplemental line extension**
142 **provision.**

143 A. As stated in my rebuttal testimony this recommendation is not in line with the role of a
144 distribution utility and is better placed with federal and state regulations and associated charging
145 grant specifications. Additionally, as ChargePoint witness Deal points out, "the regulations to
146 establish minimum standards and requirements for projects funded under the NEVI program,
147 including uptime requirements, are still being developed and it would be inappropriate to broadly
148 impose a requirement based on federal regulations for a specific program that are yet to be
149 finalized." (ChargePoint Ex. 2.0 at 36:9-12 .) The Company still maintains any uptime standard
150 or monitoring is best set and administered at the statewide level.

151 **Q. Staff witness Kierbach addressed his concerns with smart charger use in his direct**
152 **as well as his rebuttal testimony and recommends the Commission direct Ameren to**
153 **modify its BE Plan to require smart chargers for any public use chargers. Please respond.**

154 A. The Company supports Staff witness Kierbach's belief the "smart charger" requirement
155 he suggests is met without introducing another requirement in the specification sheet. (ICC Staff
156 Ex 14.0 at 16: 374-376)

157 **Q. How do you respond to Staff witness Kierbach's recommendation that Ameren**
158 **Exhibit 7.3 should reflect the minimum requirements of 100kW in the Corridor Charging**
159 **Facility Program because it specifies exactly the minimum kW to charge two vehicles for**
160 **level 3 charging?**

161 A. Ameren Exhibit 7.3 Revised Qualifying Electric Vehicle Facility Specifications should
162 not reflect a minimum requirement of 100kW because Staff witness Kierbach believes it
163 specifies the exact minimum kW to charge two vehicles for Level 3 charging. The requirement to
164 charge 2 vehicles at once is already clearly laid out in Ameren Exhibit 7.3 by stating qualifying
165 installations must install charging with the capability to charge at least 2 vehicles simultaneously.

166 **Q. How do you respond to Staff witness Kierbach's recommendation that AIC should**
167 **modify its Public Charging Facility Program to clarify the capability to charge at least two**
168 **vehicles simultaneously per charging level?**

169 A. The Company does not agree with the proposed modified language for Ameren Exhibit
170 7.3. Staff witness Kierbach states the intent of this recommendation is to make clear, regardless
171 of the charging station installed, two vehicles can charge simultaneously per charging level.
172 However, the existing language already states installations must have the capability to charge at
173 least 2 vehicles simultaneously. The Company also disagrees with Staff witness Kierbach
174 redefining the minimum size level 3 DC charging must be in order to enroll in the Public
175 Charging Program.

Q. Staff witness Kierbach agrees with ChargePoint witness Deal that all participants receiving rebates through the Residential Home Charging program should install charging stations that are networked, ENERGY STAR certified and UL-listed. Do you agree with this requirement?

A. No. This recommendation by Staff witness Kierbach and ChargePoint witness Deal is premature and will cause undue costs that produce little or no benefits. Additionally, such a requirement may also limit equipment availability.

Q. ChargePoint witness Deal testified that no unilateral standards from a utility were needed, however, recommended ICC workshops. Please respond to this recommendation.

A. AIC would support a statewide working group or collaborative effort that involves all key agencies (IDOT, IEPA, ICC) and interested stakeholders to discuss the capabilities of charging stations and consider appropriate standards and evidence-based uptime requirement

Q. Staff witness Kierbach recommends that Ameren communicate charger availability. Please respond.

A. Staff witness Kierbach recommends requiring any charging station, that receives an incentive or investment from Ameren, provide information surrounding charger availability (in use, available, or maintenance, price (free or pay), connector types (level 1, Level 2, J1772, Level 2 Tesla, DCFC CHAdeMO, DCFC CCS, and DCFC Tesla) to Ameren or another charging network. If a charging station is not already a part of a charging network such as EVgo, ChargePoint, Electrify America, ChargeHub, PlugShare, etc. reflected on Ameren's maps, or it doesn't provide the information for Ameren's maps in another manner, then it [public charging station owner] should register as one of these mentioned to address my concern with

communication of availability (ICC Staff Ex. 5.0 at 19). The Company still asserts these recommendations are not in line with the role of a distribution utility and it is in the charging station operator's best interest to ensure the availability of its stations, and the list of staff recommended attributes, are known. Furthermore, Ameren does not own charging network maps. The "Charging Corridor Map", as Staff witness Kierbach calls it, is a capacity map to show qualifying location for corridor charging facilities. This map will not display charger availability, price, connector types, etc. as Staff witness Kierbach alludes to.

Q. In his rebuttal testimony, ChargePoint witness Deal disagrees with NRDC's recommendation to require Ameren Illinois to modify its public charging stations payment specifications to replicate a system used in California. Do you share Mr. Deal's concern?

A. Yes. Chip-based and contactless payment is already included in the approved specifications for Rider EVCP participation. NRDC has provided no compelling evidence showing that the payment methods already included in Rider EVCP would present a barrier to equitable access to charging stations.

Q. EDF witness MacDougall continues to recommend several charging station requirements, including ISO 15118, Open Charge Point Protocol (OCPP), and security standards for chargers receiving funding. How do you respond?

A. The Company maintains that a utility should not be requiring these standards and any standards or monitoring is best set and administered at the statewide and/or federal level. Additionally, as ChargePoint witness Deal states, it would be inappropriate to adopt standards based on the NEVI program that is still under regulatory review. (ChargePoint Exhibit 2.0, at 32).

220 V. **SIZE & SCOPE OF PROGRAMS**

221 A. **Response to Intervenor regarding overall budget for the BE Plan**

222 Q. **Did Intervenor propose to modify the overall budget of the BE Plan?**

223 A. Yes. Attorney General witnesses Borden and Lane recommend the overall budget be
224 reduced. The witnesses for the AG recommend that the budgets should be set at Ameren's
225 original forecast.

226 Q. **What is the basis for the concerns expressed by the witnesses for the AG?**

227 A. It appears that the witnesses for the AG believe that the proposed increase in spending
228 levels should be based on an assessment of estimated participation and not artificially inflated to
229 support the interests of other witnesses.

230 Q. **Do you agree with the witnesses for the AG?**

231 A. No. The increase in budget enables Ameren Illinois the opportunity to provide significant
232 progress toward meeting the State's ambitious clean energy objectives, including supporting EV
233 adoption levels of 1,000,000 electric vehicles by 2030.

234 Q. **Do any other witnesses recommend reducing the size of the overall BE Plan budget?**

235 A. No. The witnesses for the AG are the only party to suggest that AIC spend less to achieve
236 the State's goals to place 1 million EVs on the road by 2030.

237 B. **Response to Intervenor regarding Size and Scope of various Programs**

238 Q. **Do Staff and Intervenor witnesses continue to recommend changes to specific**
239 **programs or program details?**

240 A. Yes. EDF witness MacDougall, ChargePoint witness Deal, Staff witnesses King, Struck,
241 and Jenkins and Attorney General witnesses Borden and Lane propose modifications to various
242 programs, including the Residential Home Charging, Fleet Facility Program, the Trade Ally
243 Program, the Fleet Assessment Program, and the Community Engagement and Consultation
244 Program. I respond to each, in turn, below.

245 **1. Residential Home Charging Program**

246 **Q. Did any witnesses respond to the numerous suggestions for changes to this program**
247 **that were set forth in the direct testimony of ChargePoint witness Deal?**

248 A. In his rebuttal testimony, Staff witness King recommends that the Commission reject
249 ChargePoint's recommendations to expand the availability of the program to all customers, not
250 just residential low-income or equity eligible customers.

251 **Q. Do you agree with Staff witness King's recommendation?**

252 A. Yes.

253 **Q. Does Staff witness King make other recommendations regarding the size and scope**
254 **of the program?**

255 A. Yes. Staff witness King supports AIC's proposal to remove any limitation on the number
256 of eligible customers that can take advantage of the program.

257 **Q. Were there any other recommendations regarding this program?**

258 A. Yes. In rebuttal testimony, the witnesses for the AG recommended that Level 2 charging
259 infrastructure may not be necessary and that at least half of the proposed funds for Level 2
260 chargers be shifted to the Community Engagement and Consultation Program to support low-

income and equity investment incentives in those communities. Staff witness King opposed the recommendation of the AG witnesses and agrees with AIC's recommendations that Level 2 charging infrastructure should remain part of the program. As stated in my rebuttal testimony, Level 1 chargers may not be a sufficient alternative for some residential customers who travel more than 32 miles a day because Level 1 charger could only provide about 4 miles per hour of charging. Residential customers charging at that level would most likely need to charge outside Rider EVCP's Preferred Charging Period. Finally, by shifting half of the proposed budget for the Residential Home Charging Program, it would greatly restrict any budget flexibility opportunities for this new program.

Q. Is AIC proposing any further changes to the Residential Home Charging Program?

A. Yes. Based on Staff witness Struck's recommendation, the budget for the Residential Home Charging Program has increased. A portion of the budget for the Fleet Facility Program was shifted to support additional participation in a program that has a RIM above 1.0.

2. Multifamily Facility Program

Q. Is AIC proposing any further changes to the Multifamily Facility Program?

A. Yes. Similar to the Residential Home Charging Program, based on Staff witness Struck's recommendation the budget for the Multifamily Facility Program has increased. A portion of the Fleet Facility Program budget was shifted to support additional participation in a program that has a RIM above 1.0.

3. Corridor Charging Facility and Public Charging Facility Program

Q. Did any Intervenors propose any additional modification to the Corridor and Public Charging Program?

283 A. Yes. ChargePoint witness Deal recommends allowing all non-residential customers,
284 including Public Charging Facilities, to receive the supplemental line extension allowances
285 proposed in Rider EVCP. Witness Deal also recommends Ameren to expand the eligibility of the
286 Fleet Facility program to allow site hosts to provide non-public chargers to vehicles that they do
287 not own or lease, such as their employees' vehicles.

288 **Q. How do you respond to ChargePoint witness Deal?**

289 A. The Company disagrees with ChargePoint witness Deal's recommendations. Public
290 Charging Facilities are eligible to receive a supplemental line extension when located in
291 identified Equity Investment Eligible and/or Low-Income Communities with excess capacity. As
292 stated in my direct testimony, the available capacity requirement is intended to encourage Level
293 3 DC charging stations to locate in areas with available system capacity supporting an efficient
294 use of the distribution system. One of the intents of the Act is to provide opportunity and
295 incentives to increase ownership and use of electric vehicles, especially in equity investment
296 eligible and/or low-income communities. These two Public Charging Facility supplemental line
297 extension requirements help promote Level 3 charging solution in equity investment eligible
298 and/or low-income communities. Additionally, while the Company is supportive of charging
299 applications in the workplace, programs that incentivize "non-public" charging infrastructure
300 would detract from the BE Plan's focus on encouraging publicly accessible charging, with an
301 emphasis in equity investment eligible and / or low-income communities.

302 **Q. Is AIC proposing any further changes to the Corridor and Public Charging**
303 **Program?**

304 A. No.

4. Fleet Facility Program

Q. Please summarize Mr. Struck's concerns and proposed modifications related to the Company's Fleet Program.

A. Staff witness Struck is concerned that the Fleet Program does not put downward pressure on rates and that Ameren's rebuttal BE Plan increases the percentage of the BE Plan going to the Fleet Facility Program which will produce long-term upward pressure on rates.

Q. Staff witness Struck recommends AIC limit the Fleet Facility Program to no more than 6.34% of the BE Plan budget for 2024 as presented in Ameren's direct testimony and recommends this same percentage spend for 2025. If when the BE plan is implemented, 6.34% proves to be too small, budget flexibility as outlined by Staff witness June Poon can help Ameren meet its goals. How do you respond?

A. The Company considered Staff witness Struck's recommendations, and in the spirit of collaboration the proposed budget has been reduced for the Fleet Facility Program to 6.34% of the total BE Plan spend for years 2024 and 2025.

Q. Is AIC proposing any additional changes to the Fleet Facility Program?

A. No.

5. Trade Ally Program

Q. How did witnesses respond to the proposed changes to the Trade Ally Program in the Company's Rebuttal BE Plan?

A. Staff witness Struck believes that the proposed changes are a reasonable improvement to AIC's BE Plan (ICC Staff Ex. 11.0).

326 **Q. Is AIC proposing any additional changes to the Trade Ally Program?**

327 A. Yes. The Trade Ally Program budget was increased slightly to accommodate
328 administration of the additional rebates being supported by the EVCP Residential Program.

329 **6. Fleet Assessment Program**

330 **Q. Staff witness Jenkins expresses support for the recommendation of the AG for a**
331 **cost-sharing component to the Fleet Assessment program. How do you respond?**

332 A. While Staff witness Jenkins supports this recommendation, he proposes that AIC impose
333 a ten percent to twenty percent refundable cost-sharing fee to be applied at its own discretion to
334 ensure that program funds spent lead to electrification.

335 **Q. Do any other witnesses address this concept of cost-sharing proposal?**

336 A. Yes. EDF witness MacDougall recommends that the Commission reject the AG's fleet
337 cost sharing proposal as such a requirement would create another barrier to fleet electrification
338 while providing a miniscule, and largely theoretical cost savings for ratepayers. (EDF Exhibit 2.0
339 at 14: 248-249).

340 **Q. Does AIC support inclusion of a cost-sharing component to this program?**

341 A. No. AIC agrees with EDF and reemphasizes the importance as to not discourage a
342 company from considering electrification by imposing a fee for the fleet assessment.

343 **Q. Did any witnesses make other recommendations regarding the Fleet Assessment**
344 **Program?**

345 A. Yes. In Direct Testimony, EDF witness MacDougall recommended the Fleet Assessment
346 Program be expanded beyond 20 fleets per year and the Company hire a dedicated liaison to be a
347 single point of contact for fleets.

348 **Q. Did any intervenor witness address this recommendation in rebuttal testimony?**

349 A. Yes. Staff witness Jenkins opposed EDF's recommendations.

350 **Q. Staff witness Jenkins acknowledged EDF's recommendation that AIC proactively**
351 **contact fleets that are candidates for electrification. How do you respond?**

352 A. AIC agrees with this recommendation and notes that a proactive outreach will be planned
353 as part of the Fleet Assessment Program.

354 **Q. Is AIC proposing any additional changes to the Fleet Assessment program?**

355 A. No.

356 **7. Community Engagement and Consultation Program**

357 **Q. AG witnesses Mr. Borden and Ms. Lane indicated that they support the Company's**
358 **Community Engagement and Consultation Program (CEC). Do you have anything**
359 **additional to add regarding Mr. Borden and Ms. Lane's support?**

360 A. Ameren Illinois appreciates Mr. Borden and Ms. Lane's recognition of the Company's
361 efforts – through the CEC program – to develop meaningful assistance related to EV adoption in
362 Equity Investment Eligible and Low-Income communities. However, as discussed above, the
363 recommendation to shift at least half of the proposed funds away from the Residential Home
364 Charging Program to the CEC program is not supported.

365 **Q. Is the Company proposing any additional changes to the CEC Program in its**
366 **surrebuttal testimony?**

367 A. No.

368 **8. Driver Education Program**

369 **Q. Did any witness opine on the proposed Driver Education Program?**

370 A. Yes. Staff witness Jenkins opposed the AG's recommended modifications and agree with
371 AIC's rationale for opposition to the proposed limitations on the program.

372 **Q. Is AIC proposing any changes to the Driver Education Program?**

373 A. No.

374 **VI. CONCLUSION**

375 **Q. Does this conclude your surrebuttal testimony?**

376 A. Yes, it does.